

Jeff S. Meyer, WSB No. 6-4280
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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

RODNEY MIEARS and MARIAN)	
MIEARS, husband and wife,)	
)	
Plaintiffs,)	
)	
vs.)	Civil Action No.: 18-CV-225F
)	
SYSCO MONTANA, INC.,)	
)	
Defendant.)	

DEFENDANT’S DESIGNATION OF EXPERT WITNESSES

COMES NOW Defendant, Sysco Montana, Inc. (“Defendant”), and pursuant to the Court’s *Order on Initial Pretrial Conference* dated March 21, 2019, hereby provides its designation of expert witnesses as follows:

- Robert A. Narotzky, MD, FAANS**
Neurosurgical Consulting Services, LLC
1680 Harrison Meadow Rd
Bozeman, MT 59715
(307) 262-6171

Dr. Narotzky is a board-certified neurological surgeon. He has reviewed materials pertaining to this matter. Dr. Narotzky’s report is attached hereto as Exhibit A and incorporated herein. He is expected to provide testimony and opinions as set forth within his report.

Dr. Narotzky is expected to testify regarding his education, training and experience. He will

testify regarding Plaintiff Rodney Miears' injuries, and his impressions and conclusions regarding the same. Dr. Narotzky may offer testimony to rebut any medical opinions set forth by Plaintiffs' expert witnesses and will testify consistent with any other issues involving Plaintiff Rodney Miears' injuries, their cause, the diagnosis, the treatments and prognosis. Dr. Narotzky reserves the right to supplement his opinions in this case based upon his review of additional information acquired during discovery or trial, or upon his review of other reports or records of other providers or experts, or upon his examination of Plaintiff.

If Dr. Narotzky is deposed, the contents of his deposition are incorporated herein. His Curriculum Vitae is attached hereto as Exhibit B and incorporated herein; his fee schedule is attached hereto as Exhibit C and incorporated herein; and his List of Testimony is attached hereto as Exhibit D and incorporated herein.

2. **John M. Jansen, Ed.D., CRC**
Vocational and Psychological Rehabilitation
and Life Care Planning Services
7761 West Riverside Drive, Suite 120
Boise, ID 83714
(208) 344-4285

Dr. Janzen is a vocational and psychological rehabilitation and life care planner. He has reviewed materials pertaining to this matter. Dr. Janzen's report is attached hereto as Exhibit E and incorporated herein. He is expected to provide testimony and opinions set forth within his report.

Dr. Janzen is expected to testify regarding his education, training and experience. He will testify regarding the vocational and psychological condition of Plaintiff Rodney Miears, and his impressions and conclusions regarding the same. Dr. Janzen may offer testimony to rebut any vocational and psychological opinions set forth by Plaintiffs' expert witnesses and will testify consistent with any other issue involving Plaintiffs' injuries, their causes, the diagnoses, the treatments and prognoses. Dr. Janzen reserves the right to further supplement his opinions in this

case based upon his review of additional information acquired during discovery or trial, or upon his review of other reports or records of other providers or experts, or upon his examination of Plaintiff.

If Dr. Janzen is deposed, the contents of his deposition are incorporated herein. His Curriculum Vitae is attached hereto as Exhibit F and incorporated herein; his fee schedule is attached hereto as Exhibit G and incorporated herein; and his List of Testimony is attached hereto as Exhibit H and incorporated herein.

3. **Lew Grill**
The Legacy Corporation International
The Legacy Building
1236 Cordova Street
Billings, MT 59101
(800) 457-5744

Mr. Grill is a trucking industry and truck driving expert. Mr. Grill's expertise includes owner operations, carrier management, driver management, truck driver training, truck driver training program director, compliance with federal and state regulations, and as a consultant for motor carriers and truck driving schools. He has reviewed materials pertaining to this matter. Mr. Grill's report is attached hereto as Exhibit I and incorporated herein. He is expected to provide testimony and opinions as set forth within his report.

Mr. Grill is expected to testify regarding his education, training and experience. He will testify regarding those matters stated in his report, and his experience in the commercial motor vehicle industry and as a driver and manager of commercial motor vehicle drivers. Mr. Grill may offer testimony to rebut any industry standard opinions set forth by Plaintiffs' expert witnesses. Mr. Grill reserves the right to supplement his opinions in this case based upon his review of additional information acquired during discovery or trial, or upon his review of other reports or records of other experts.

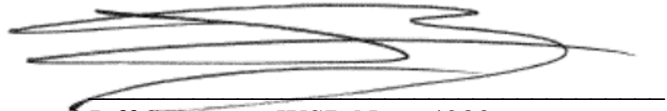
If Mr. Grill is deposed, the contents of his deposition are incorporated herein. His

Curriculum Vitae and List of Testimony are attached hereto as Exhibit J and both are incorporated herein; and his fee schedule is attached hereto as Exhibit K and incorporated herein.

4. Defendant reserves the right to call any rebuttal witness as necessary and as permitted by the Federal Rules of Civil Procedure.

5. Defendant further reserves the right to designate any witness necessary to lay foundation for any exhibit or document utilized by any named expert; to designate additional medical providers of the Plaintiff which are currently unknown; and to supplement this designation as necessary.

DATED this 7th day of November 2019.

A handwritten signature in dark ink, appearing to read 'Jeff S. Meyer', is written over a horizontal line.

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CERTIFICATE OF SERVICE

This is to certify that on this 7th day of November 2019, I served a true and correct copy of the above and foregoing via CM/ECF electronic filing upon counsel properly addressed as follows:

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